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April 6, 2023

VIA ECF

Pamela K. Chen, U.S.D.J.
United States District Court, Eastern District of New York
225 Cadman Plaza East, Courtroom 4F North
Brooklyn, New York 11201-1804

Re: *IME Watchdog, Inc. v. Gelardi, et al.*
Case No.: 1:22-cv-1032 (PKC)(JRC)

Dear Judge Chen:

We represent defendants Safa Gelardi, Vito Gelardi and IME Companions LLC and write to object to plaintiff's proposed Court-Authorized Notice (ECF Docket No. 187). While the "Notice" language in the proposed Court-Authorized Notice comports with your Honor's Minute Order dated April 3, 2023, your Honor did not Order that the Court-Authorized Notice could include the introductory statement above the Notice language which states that the Notice is addressed "To: all law firms who utilized the services of defendant IME Companions LLC, Client Exam Services LLC, and/or any company in any way related to the foregoing entities, Safa Abdulrahman Gelardi, Vito Gelardi, Jeff Beiben, Fari Gutierrez, Hesham Salameh, "Sammy," and any employees or agents of these entities and/or individuals with respect to observing, managing, administering, or otherwise in any way related to independent medical examinations."

The Notice should not include any such language. It should simply be sent to those on your Honor's approved Enjoined Customer List.

Respectfully yours,

/s/ Jonathon D. Warner

JDW/ks

cc: All counsel (via ECF)